



SUBMISSION

on Ukraine's implementation of recommendations concerning the protection of the rights of people affected by Russia's armed aggression as part of the Universal Periodic Review

ABOUT THE COALITION

The Coalition of organisations dealing with the protection of the rights of victims of armed aggression against Ukraine is an informal association of leading Ukrainian civil society human rights and charitable organisations that have worked together since 2014 to address the consequences of the Russian Federation's armed aggression. In particular, experts from the Coalition's member organisations contribute to the development of strategic public policy documents concerning the affected population, namely internally displaced persons, residents of the temporarily occupied territories of Ukraine, persons missing as a result of the war, civilians held unlawfully, and Ukrainian citizens forced to relocate abroad. The Coalition has a proven record of effectively advancing legislative initiatives while providing high-quality expertise and institutional memory in the field of human rights protection. Over the years, the Coalition has become a reliable and expert partner to state institutions in developing and improving policies to protect the rights of the affected population. Through systematic analytical work and direct engagement with the affected population, the Coalition's experts propose effective, human-centred solutions to the state that provide a foundation for developing a strategic vision for Ukraine's future reintegration and recovery.

The Coalition comprises the following organisations:

NGO Human Rights Centre ZMINA, <https://zmina.ua/>

NGO Donbas SOS, <http://www.donbasssos.org>

NGO CrimeaSOS, <http://krymsos.com/>

CF Right to Protection, <http://www.r2p.org.ua>

CF East SOS, <https://east-sos.org/>

NGO Civil Holding GROUP OF INFLUENCE, <https://www.vplyv.org.ua/>

NGO Crimean Human Rights Group, <https://crimeahrg.org/uk/>

CF Stabilization Support Services, <https://sss-ua.org/>

NGO Crisis Insight, <https://www.facebook.com/crisis.insight>

LIST OF ABBREVIATIONS

CMU – Cabinet of Ministers of Ukraine, government

CRSV – conflict-related sexual violence

FDI – foreign diplomatic institution

GCA – government-controlled areas

IDP – internally displaced person

MES – Ministry of Education and Science of Ukraine

Ministry for Development – Ministry for Development of Communities and Territories of Ukraine

Ministry of Reintegration – Ministry of Reintegration of the Temporarily Occupied Territories of Ukraine

Ministry of Social Policy – Ministry of Social Policy, Family and Unity of Ukraine

PFU – Pension Fund of Ukraine

TOT – temporarily occupied territories

INTRODUCTION

On 15 November 2017, Ukraine presented its National Report on the human rights situation as part of the third cycle of the Universal Periodic Review (UPR). Following its consideration, the Human Rights Council Working Group made 190 recommendations to Ukraine, 163 of which were supported by the state. In 2020, as part of Ukraine's mid-term reporting on the implementation of the UPR recommendations, the Coalition of organisations dealing with the protection of the rights of victims of armed aggression against Ukraine (hereinafter, the Coalition) submitted an alternative report to the Human Rights Council on Ukraine's implementation of recommendations concerning the protection of conflict-affected persons and mitigation of the conflict's adverse consequences.¹

Despite the protracted armed aggression against Ukraine, which escalated into the Russian Federation's full-scale invasion in February 2022, some of the recommendations made in 2017 remain relevant and have acquired renewed significance in 2026. The Coalition prepared this submission to assess the implementation of recommendations relating to support for victims of the armed aggression against Ukraine.

¹ Mid-term NGO Report on the Universal Periodic Review of Ukraine (with regard to protecting the rights of victims of armed conflict). Coalition of organisations dealing with the protection of the rights of victims of armed aggression against Ukraine, 2020. URL: https://zmina.ua/wp-content/uploads/sites/2/2020/12/zmina-alternatereporten_web.pdf

1. Support for Victims of Armed Aggression against Ukraine

116.28. Increase the resources allocated to the new Ministry of Temporarily Occupied Territories and Internally Displaced Persons (Greece);

116.29. Increase the human and financial resources of the Ministry of Temporarily Occupied Territories and Internally Displaced Persons in order to fulfil its mandate fully (Croatia).

NOT IMPLEMENTED YET

1.1. From 2016 to 2025, Ukraine's executive branch included a ministry responsible for developing and implementing state policy on the TOT and internally displaced persons. Following a series of reorganisations (its merger with the Ministry for Veterans Affairs in 2016, the subsequent separation of the two ministries, its renaming and the appointment of a Deputy Prime Minister of Ukraine to head it), the Ministry of Reintegration of the Temporarily Occupied Territories of Ukraine (hereinafter, the Ministry of Reintegration) was dissolved in 2025.

1.2. The Ministry of Reintegration was assigned a broad range of responsibilities for addressing the adverse consequences of armed aggression against Ukraine. These included developing and implementing state policy on IDPs and persons fled abroad due to war; ensuring Ukraine's compliance with international humanitarian law; coordinating the provision of humanitarian assistance to civilians; restoring and building peace; and helping to meet the socio-economic, environmental, information and cultural needs of the population living in the TOT of Ukraine and in areas adjacent to them. The Ministry of Reintegration coordinated the evacuation of the population from the TOT of Ukraine and areas affected by hostilities. Most importantly, it was the authority responsible for coordinating state policy on protecting the rights of the affected population and developing a policy for the reintegration of the TOT.

1.3. Civil society and human rights organisations, including members of the Coalition, raised concerns about the dissolution of the Ministry of Reintegration and the redistribution of its responsibilities.² Their position was based on the critical importance of preserving the policy area of reintegration of the TOT of Ukraine and supporting and safeguarding the rights of victims of the Russian Federation's armed aggression against Ukraine. Maintaining the institutional capacity to respond to and address the adverse consequences of war and occupation, as well as to develop a strategic vision for future reintegration, is therefore essential to Ukraine's continued development.

1.4. Despite these concerns, the Government decided first to rename and subsequently to dissolve the Ministry of Reintegration. Its responsibilities were redistributed among the Ministry for Development, the Ministry of Social Policy and other ministries. Some responsibilities were "lost", and remained unexercised for a considerable period. These included ensuring the development and implementation of transitional justice principles and measures, powers of implementing state policy on protecting individuals' rights and freedoms where those rights and freedoms had been violated as a result of temporary occupation, and other responsibilities.³

1.5. The dissolution of the Ministry of Reintegration had significant adverse consequences for the protection of the rights of victims of armed aggression against Ukraine, particularly residents of the TOT of Ukraine. As of July 2026, some of the responsibilities assigned to the Ministry for Development,

² Statement on ensuring the implementation of the powers of the Ministry of Reintegration of Temporarily Occupied Territories of Ukraine. 18 September 2024. URL: <https://zmina.ua/en/statements-en/statement-on-ensuring-the-implementation-of-the-powers-of-the-ministry-of-reintegration-of-temporarily-occupied-territories-of-ukraine/>

³ Analytical Note, "Has the government lost important powers when liquidating the Ministry of Reintegration?". Coalition of organisations dealing with the protection of the rights of victims of armed aggression against Ukraine, 2025. URL: https://zmina.ua/wp-content/uploads/sites/2/2025/06/min_eng_web-1.pdf

including those relating to support for IDPs, have been transferred to other ministries. The exercise of responsibilities concerning the TOT of Ukraine is effectively limited to isolated legislative and policy initiatives, remains fragmented and lacks adequate inter-agency coordination.

1.6. Despite the large number of victims of armed aggression against Ukraine, as of 2026 there is no systematic policy for supporting them. Given the protracted armed conflict and occupation of part of Ukraine's territory, since 2014 the state has gradually designated individual categories of persons eligible for support in connection with the consequences of the war. These include IDPs, persons missing as a result of the war, survivors of CRSV, war-affected children and others. There are currently more than ten such categories. However, there is no single authority within the Government responsible for developing and implementing policy concerning victims of armed aggression against Ukraine. Repeated changes to the responsible ministries and the redistribution of responsibilities among them have resulted in fragmentation, unpredictability and the absence of a coherent vision in state policy concerning the affected population.

6.102. Implement the recommendations contained in the latest report by the human rights monitoring mission in Ukraine of September 2017, notably to develop a national mechanism to make available to civilian victims of the conflict adequate, effective, prompt and appropriate remedies, including reparation (Austria).

IN THE PROCESS OF IMPLEMENTATION

1.7. Proper recording of pecuniary and non-pecuniary damage caused by armed aggression against Ukraine, identification of affected persons and the provision of accessible compensation mechanisms are essential prerequisites for restoring justice. However, the existing mechanisms remain fragmented, cover only certain types of damage and categories of victims, and do not constitute a comprehensive system of recording, compensation and support. Law of Ukraine No. 2923-IX, adopted in February 2023,⁴ provides that the national compensation mechanism covers only certain categories of damaged or destroyed residential property and does not provide compensation for non-residential immovable property or movable property. It also does not cover property damaged or destroyed before 24 February 2022 or property situated in the TOT of Ukraine as of the date of the Russian Federation's full-scale invasion. Consequently, owners of property in the Autonomous Republic of Crimea, the city of Sevastopol and the parts of the Luhansk and Donetsk regions occupied before 2022 are effectively denied access to the national compensation mechanism. Foreign nationals who are lawfully present in Ukraine and have suffered property damage are likewise ineligible for compensation.

1.8. With regard to non-pecuniary damage, Law of Ukraine No. 4071-IX, adopted in November 2024,⁵ established the legal framework for recording information on harm caused to personal non-property rights as a result of the Russian Federation's armed aggression. However, the system for recording such information has not become operational. The Government has neither defined the categories of affected persons in legislation nor established and ensured the operation of a comprehensive support system for the war-affected population. Consequently, access to state support depends on possession of a special status or certificate rather than on victims' actual needs, while a significant proportion of those who have suffered harm to their life and health, personal liberty or other non-property rights remain without the necessary support.

1.9. In May 2023, the Council of Europe adopted a resolution establishing the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine. Under the resolution, the Register

⁴ Law of Ukraine "On Compensation for Damage to and Destruction of Certain Categories of Immovable Property as a Result of Hostilities, Terrorist Acts, and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine, and the State Register of Property Damaged and Destroyed as a Result of Hostilities, Terrorist Acts, and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine", No. 2923-IX of 23 February 2023. URL: <https://zakon.rada.gov.ua/laws/show/2923-20#Text>

⁵ Law of Ukraine "On the Recording of Information Regarding Harm Caused to the Non-Property Rights of Individuals as a Result of the Armed Aggression of the Russian Federation Against Ukraine", No. 4071-IX of 20 November 2024. URL: <https://zakon.rada.gov.ua/laws/show/4071-20#Text>

serves as a record of evidence and information relating to claims concerning damage, loss or injury caused on or after 24 February 2022 to all natural and legal persons concerned, as well as to the state of Ukraine, including its regional and local authorities and state-owned or state-controlled entities, in the territory of Ukraine within its internationally recognised borders, extending to its territorial waters. In December 2025, during a high-level diplomatic conference in The Hague, the Minister of Foreign Affairs of Ukraine signed the Convention Establishing an International Claims Commission for Ukraine on behalf of Ukraine. The Convention establishes the Claims Commission as an independent international body within the institutional framework of the Council of Europe. It will consider claims for compensation for damage, loss or injury caused by internationally wrongful acts of the Russian Federation in or against Ukraine and determine the amount of compensation in each case. The Claims Commission will operate on the basis of the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine. The Verkhovna Rada of Ukraine ratified the Convention in April 2026.⁶

RECOMMENDATIONS:

1. Designate an authority within the CMU responsible for developing and implementing state policy concerning victims of armed aggression against Ukraine.
2. Develop a systematic policy to support victims of armed aggression against Ukraine, including residents of the TOT of Ukraine.
3. Establish a comprehensive, non-discriminatory system for recording non-pecuniary damage caused by armed aggression against Ukraine.
4. Ensure the proper functioning of the national mechanism for providing compensation for residential property destroyed or damaged as a result of armed aggression against Ukraine.

⁶ Convention Establishing an International Claims Commission for Ukraine of 16 December 2025 (ratified by the Verkhovna Rada of Ukraine by Law No. 4868-IX of 30 April 2026). URL: https://zakon.rada.gov.ua/laws/show/994_003-25#Text

2. Protection of the Rights of Citizens Living in the TOT of Ukraine

6.60. Simplify access to public administrative services for Crimean residents and enable Ukrainian citizens to move freely between Crimea and the rest of Ukraine, recognising UN General Assembly Resolution No. 68/262, “Territorial Integrity of Ukraine”, UN General Assembly Resolution No. 71/205, “Situation of Human Rights in the Autonomous Republic of Crimea and the City of Sevastopol (Ukraine)”, and Ukraine’s sovereignty over Crimea (United Kingdom of Great Britain and Northern Ireland).

6.63. Use all existing instruments and mechanisms to protect the human rights and freedoms of Ukrainian citizens living in the TOT of Ukraine while taking political and diplomatic steps aimed at restoring Ukraine’s territorial integrity within its internationally recognised borders (Georgia).

IN THE PROCESS OF IMPLEMENTATION

2.1. Following the beginning of the Russian Federation’s full-scale invasion in February 2022, the area of Ukrainian territory under temporary occupation increased and now accounts for approximately 19% of the country. The population of the TOT of Ukraine is estimated at 3–5 million. Meanwhile, the human rights situation in these territories has deteriorated significantly⁷: the Russian Federation has turned widespread violations of human rights and international humanitarian law into administrative practices and made them part of its state policy.⁸

2.2. Ukraine does not recognise documents issued by any authority established in the TOT of Ukraine, except for civil status records concerning births, deaths, marriages and divorces, which may be used to register these events in accordance with the procedure prescribed by Ukrainian law.⁹ However, the provision allowing authorised state authorities to use documents certifying births, deaths, marriages and divorces in the TOT of Ukraine is not operational. A simplified judicial procedure is available for establishing births and deaths that occurred under occupation. Despite providing for expedited consideration of such cases, the requirement to apply to a court significantly complicates the process of obtaining documents under the current conditions of the ongoing armed aggression against Ukraine.

2.3. The registration of children’s births is a particularly acute issue. Although an estimated 104,046 children were born in the TOT of Ukraine between 2022 and 2024, and only 9,820 of these births, fewer than 10%, were registered in GCA. By comparison, 64,000 children obtained Ukrainian birth certificates between 2016 and 2022, including 11,359 in 2019 alone. In 2025, only 863 births that occurred in the TOT of Ukraine were registered, compared with 1,425 in 2024. These figures demonstrate a sharp decline in the number of births in the TOT of Ukraine registered by Ukraine. This is a direct consequence of both restrictions imposed by the occupation authorities on freedom of movement from the TOT of Ukraine to GCA and Ukraine’s excessive requirement that birth registration be addressed exclusively through judicial proceedings, a problem compounded by inconsistent case law.¹⁰

7 Situation of human rights in the temporarily occupied territories of Ukraine, including the Autonomous Republic of Crimea and the city of Sevastopol Report of the Secretary-General. A/80/315, 6 August 2025. URL: <https://ukraine.ohchr.org/sites/default/files/2025-11/n2521410.pdf>

8 Special Report of the Ukrainian Parliament Commissioner for Human Rights on the Situation in the Territories of Ukraine Temporarily Occupied by the Russian Federation, “What means the Russian Federation uses to occupy and subjugate the population of the temporarily occupied territories of Ukraine?” (March 2025). URL: <https://www.ombudsman.gov.ua/storage/app/media/uploaded-files/SpecialReport2025-eng.pdf>

9 Law of Ukraine “On Ensuring the Rights and Freedoms of Citizens and the Legal Regime in the Temporarily Occupied Territory of Ukraine”, No. 1207-VII of 15 April 2014, Article 9. URL: <https://zakon.rada.gov.ua/laws/show/1207-18#Text>

10 What are the possible approaches regarding documents issued under the occupation? Analytical Note. Coalition of organisations dealing with the protection of the rights of victims of armed aggression against Ukraine, 2025. URL: https://zmina.ua/wp-content/uploads/sites/2/2025/02/document_eng_web_dokumenty-vydani-na-tot.pdf

2.4. Civil status records are only one example of the state's approach to documents issued to Ukrainian citizens under occupation. Since the occupation began in 2014, millions of different documents that Ukraine considers invalid have been issued in the TOT of Ukraine. These include medical records, documents certifying property rights, documents establishing guardianship and identity documents. However, to safeguard the fundamental human rights and freedoms of Ukrainian citizens who live in or have fled from the TOT of Ukraine, it is essential to establish a mechanism for using information contained in documents issued under occupation. The ability to use information from these documents would create the conditions necessary for the reintegration of the population of the TOT of Ukraine.¹¹

2.5. Major violations of the law of occupation committed by the Russian Federation include coercing Ukrainian citizens living in the TOT of Ukraine to pledge allegiance to the Occupying Power and imposing Russian citizenship on them. At different times, the Russian Federation has applied different approaches to the acquisition of Russian citizenship in the TOT of Ukraine. In occupied Crimea, Russian citizenship was imposed automatically and forcibly, while the opportunity to declare the retention of Ukrainian citizenship was deliberately restricted. In parts of the Donetsk and Luhansk regions occupied after 2014, Russian passportisation began considerably later, in 2019, and was carried out through a simplified procedure for acquiring Russian citizenship. Following the beginning of the full-scale invasion by the Russian Federation in February 2022 and the illegal incorporation of four Ukrainian regions (Donetsk, Zaporizhzhia, Luhansk and Kherson) into the Russian Federation in autumn 2022, the Russian Federation launched a campaign of mass forced passportisation in these territories. The coercive nature of this policy lies in making access to fundamental rights and services in the TOT of Ukraine, including healthcare, social services, pensions, the right to own and use housing, and freedom of movement, conditional on acquiring Russian citizenship¹². Since 2025, Russian policy has stipulated that Ukrainian citizens may reside in the TOT of Ukraine only if they acquire Russian citizenship or obtain documents authorising foreign nationals to reside in the Russian Federation.

2.6. Children and young people who, owing to their age and the duration of the occupation, have not obtained a passport of a citizen of Ukraine remain in the most difficult position. Children cannot independently enter GCA before reaching the age of 18. Young people over the age of 18 encounter difficulties entering GCA because of problems verifying their identity. If a resident of the TOT of Ukraine does not have a passport of a citizen of Ukraine, they must obtain a certificate of return to Ukraine from an FDI. This document verifies the holder's identity, confirms their Ukrainian citizenship and entitles them to enter Ukraine without a passport. The issuance of certificates of return to residents of the TOT of Ukraine is complicated by several factors, including the absence of information about them in Ukrainian state registers used for identity verification and the limited range of countries to which Ukrainian citizens from the TOT of Ukraine can travel using only Russian occupation documents: Armenia, Belarus, Georgia, Kazakhstan and Türkiye. Notably, a Russian passport, which may be the applicant's only identity document bearing a photograph, is not used for identity verification either by an FDI or in GCA.

2.7. In June 2026, the Government of Ukraine introduced a mechanism for issuing certificates of return to Ukraine to certain categories of Ukrainian citizens who are abroad and lack identity documents.¹³ However, according to human rights defenders, its implementation has not fully removed the existing key barriers and, in some respects, has even created new ones.¹⁴ These include the requirement to undergo identity verification twice – first at an FDI to obtain a certificate of return to Ukraine and then in GCA to obtain a passport of a citizen of Ukraine; the disproportionately small number of FDIs implementing the project relative to the number and locations of the citizens concerned; an unjustified age restriction affecting persons born before 1991; the failure to use information from Russian

11 Ibid.

12 Imposing citizenship of the Russian Federation on the citizens of Ukraine in the occupied territory of Ukraine and in the Russian Federation. Ukraine 5AM Coalition, March 2024. URL: https://zmina.ua/wp-content/uploads/sites/2/2024/03/passport_eng_web.pdf

13 Resolution of the Cabinet of Ministers of Ukraine No. 736 of 4 June 2026, "On the Implementation of a Pilot Project for Issuing Identity Documents for Return to Ukraine to Certain Categories of Ukrainian Citizens Born in the Territory of Ukraine Temporarily Occupied by the Russian Federation". URL: <https://surl.li/rcpmkp>

14 Statement on the Procedure for Implementing the Pilot Project for Issuing Identity Documents for Return to Ukraine to Certain Categories of Ukrainian Citizens Born in the Temporarily Occupied Territory, 22 June 2026. URL: <https://www.donbasssos.org/position-on-the-issuance-of-identification-documents-for-return-to-ukraine-for-residents-of-the-temporarily-occupied-territories/>

passports as supporting data; and legal uncertainty regarding some grounds for refusing to issue a certificate.

2.8. Ukrainian children and young people living in the TOT of Ukraine lack full and safe access to Ukrainian education because of several interconnected barriers. These include the Occupying Power's policy of isolating them from the Ukrainian educational system and erasing their identity,¹⁵ restrictions on freedom of movement, Ukraine's failure to provide them with appropriate documentation, including the absence of an accessible procedure for obtaining a birth certificate, and certain inconsistencies in legislation. Consequently, in 2025, of the nearly 600,000 pupils attending local schools in the TOT of Ukraine, only 33,691 continued to study remotely at Ukrainian schools in GCA. The inability to exercise the right to education also has long-term consequences: without an appropriate educational certificate, a person is denied access to further education and a range of public services, including employment and unemployment support, social assistance and other services.

2.9. Despite lacking direct access to the TOT of Ukraine, the Ukrainian authorities have introduced mechanisms enabling children from the TOT of Ukraine to study remotely at schools in GCA¹⁶ under a specially designed educational programme that takes into account the impact of years of Russian policy.¹⁷ Although every general secondary education institution in GCA is entitled to implement this programme, very few do so in practice. This is due to a requirement under the relevant law that only one programme may be implemented at each level or cycle of complete general secondary education.¹⁸ Schools with only a small number of pupils from the TOT of Ukraine are therefore compelled to choose the general programme rather than the specialised one. Consequently, children living in the TOT of Ukraine remain unable to exercise their right to education and safely receive distance education at schools in their home country.

RECOMMENDATIONS:

1. Introduce an effective and accessible administrative, non-judicial, procedure for confirming births that occurred in the TOT of Ukraine.
2. Establish a mechanism for using information contained in documents drawn up and issued in the TOT of Ukraine to ensure access to fundamental human rights.
3. Ensure that Ukrainian citizens from the TOT of Ukraine can enter Ukraine without impediment by simplifying the procedure for obtaining a certificate of return to Ukraine, including by allowing applications to be submitted remotely.
4. Ensure the operation of the specialised educational programme by allowing general secondary education institutions to implement several educational programmes simultaneously and by approving methodological guidelines or instructions for implementing the standard educational programme for teaching persons who live or have lived in the TOT of Ukraine at the levels of complete general secondary education.

15 Report on Violations and Abuses of International Humanitarian, Human Rights and Criminal Law related to Militarization and Indoctrination of Ukrainian Children by the Russian Federation, OSCE, 9 July 2026. URL: https://odihr.osce.org/sites/default/files/documents/official_documents/2026/07/odgal0034c1%20ODIHR%20NV%20201-2026%20with%20MM%20Report.pdf

16 Order of the Ministry of Education and Science of Ukraine No. 8 of 12 January 2016, "On Approval of the Regulation on the Individual Form of Obtaining Complete General Secondary Education". URL: <https://zakon.rada.gov.ua/laws/show/z0184-16#Text>

17 Order of the Ministry of Education and Science of Ukraine No. 1047 of 21 July 2025, "On Approval of the Standard Educational Programme for Teaching at the Levels of Complete General Secondary Education Persons Who Live or Have Lived in the Temporarily Occupied Territory of Ukraine". URL: <https://ips.ligazakon.net/document/mus41813>

18 Law of Ukraine "On Complete General Secondary Education", No. 463-IX of 16 January 2020, Article 11 (1). URL: <https://zakon.rada.gov.ua/laws/show/463-20#Text>

3. Protection of the Rights of Internally Displaced Persons

6.128. Provide all eligible citizens with the benefits to which they are entitled, including pensions and social payments, regardless of their status as displaced persons or their place of residence in their own country (Switzerland).

IN THE PROCESS OF IMPLEMENTATION

6.133. Provide medical care for displaced persons (France).

IMPLEMENTED

3.1. In 2017, approximately 1.5–1.8 million IDPs were registered in Ukraine, the vast majority of whom had left their places of residence in the TOT of the Donetsk and Luhansk regions, the Autonomous Republic of Crimea and the city of Sevastopol. The full-scale invasion by the Russian Federation in 2022 transformed both the scale and nature of internal displacement: at its peak, the number of IDPs exceeded 7 million. As of 2026, official records indicate that there are approximately 4.6 million IDPs, including 821,000 children, 1.34 million pensioners and 125,000 persons with disabilities.¹⁹ The largest concentrations of IDPs are found in the Kharkiv, Donetsk and Dnipropetrovsk regions and the city of Kyiv.

3.2. Ukraine adopted the Law of Ukraine “On Ensuring the Rights and Freedoms of Internally Displaced Persons”,²⁰ in 2014. It established key support measures and guarantees for IDPs. However, following the beginning of the full-scale invasion by the Russian Federation, the Law no longer reflected the scale and nature of internal displacement. In 2024, a draft new version of the Law on Ensuring the Rights and Freedoms of IDPs, Draft Law No. 12301,²¹ was registered in the Verkhovna Rada of Ukraine and subsequently adopted by Parliament on 1 July 2026. The updated Law is intended to facilitate a transition from fragmented responses to internal displacement towards a comprehensive state policy. It establishes an integrated system of state support for IDPs at every stage of displacement, from evacuation, adaptation and integration to return and reintegration. This will enable a shift from crisis response to a long-term policy of support for IDPs. Other significant advantages of the Law include addressing legislative gaps, introducing assessments of IDPs’ needs at different stages of displacement, improving the support mechanism, ensuring access to state services and the exercise of IDPs’ rights without barriers or discrimination, and promoting their integration into receiving communities. As of 16 July 2026, the Law is awaiting the signature of the President of Ukraine.

3.3. At the government level, strategic documents on internal displacement have been in place since 2016. Before the beginning of the full-scale invasion by the Russian Federation, they focused on integrating IDPs into receiving communities. After 2022, the CMU approved the State Policy Strategy on Internal Displacement for the Period up to 2025,²² followed in 2026 by the corresponding Strategy for the Period up to 2030.²³ The latter identifies four strategic areas: ensuring a coordinated system of state policy on internal displacement, coordinating evacuation from the TOT of Ukraine, facilitating adaptation and integration in receiving communities, and creating conditions for voluntary, safe and sustainable return.

19 State Enterprise “Information and Computing Centre of the Ministry of Social Policy”. URL: <https://www.ioc.gov.ua/en/analytics/dashboard-vpo>

20 Law of Ukraine “On Ensuring the Rights and Freedoms of Internally Displaced Persons”, No. 1706-VII of 20 October 2014. URL: <https://zakon.rada.gov.ua/laws/show/1706-18#Text>

21 Draft Law “On Amendments to the Law of Ukraine “On Ensuring the Rights and Freedoms of Internally Displaced Persons” and Other Laws of Ukraine” (registration No. 12301 of 11 December 2024). URL: <https://itd.rada.gov.ua/billinfo/Bills/Card/45414>

22 Order of the Cabinet of Ministers of Ukraine No. 312-r of 7 April 2023, “On Approval of the State Policy Strategy on Internal Displacement for the Period until 2025 and the Operational Action Plan for Its Implementation in 2023–2025”. URL: <https://zakon.rada.gov.ua/laws/show/312-2023-%D1%80#Text>

23 Order of the Cabinet of Ministers of Ukraine No. 598-r of 10 June 2026, “On Approval of the State Policy Strategy on Internal Displacement for the Period until 2030 and the Operational Action Plan for Its Implementation in 2026–2028”. URL: <https://zakon.rada.gov.ua/laws/show/598-2026-%D1%80#Text>

3.4. In March 2022, a unified subsistence allowance for IDPs was introduced, along with a mechanism for compensating expenses incurred by host families and territorial communities under the Prykhystok (“Shelter”) programme. In 2023, the status of temporary accommodation facilities for IDPs was regulated by law. There has been a gradual transition from universal to targeted assistance. Compared with 2017, new legal and practical challenges have emerged. These include the protracted nature of internal displacement, which has lasted for more than four years for a significant proportion of IDPs and has brought long-term integration rather than temporary accommodation to the fore; a housing crisis caused by the destruction of housing stock and a shortage of affordable housing in receiving communities; and the depletion of the resources available to local self-government bodies.²⁴

3.5. More than 900 IDP Councils have been established and are operating in Ukraine²⁵. They are consultative and advisory bodies attached to executive authorities and local self-government bodies. The legal status of IDP Councils is defined by Resolution No. 812²⁶. These councils have become an institutional mechanism for IDP participation in the development and implementation of local policies. They facilitate dialogue among IDPs, public authorities and civil society organisations, contribute to the development of local support programmes, monitor needs and prepare recommendations on how to address them. Despite the operation of IDP Councils, the absence of systematic consultation procedures and effective feedback mechanisms with public authorities reduces the effectiveness of IDP participation in shaping policies affecting their rights and interests.

3.6. Ensuring IDPs’ right to a pension remains problematic. Despite several positive legislative changes, including the introduction of video identification, the removal of the requirement to hold an IDP certificate to receive a pension and the possibility of selecting any authorised bank for pension payments, Ukrainian state authorities impose additional requirements on IDPs in practice. These requirements are unrelated to entitlement to a pension and are instead based on a person’s place of origin, previous registered place of residence or prior receipt of services from territorial PFU bodies located in the TOT of Ukraine. Under the Law,²⁷ Ukrainian citizens who live in the TOT of Ukraine or who left it for GCA during the occupation may receive a pension only if they do not receive pension payments from the Russian Federation. Government Resolution No. 299²⁸ effectively required pensioners to inform the PFU by 31 December 2025 that they were not receiving a pension from the Russian Federation. Pension payments were suspended for those in respect of whom the PFU did not have such information. In January 2026, at least 337,000 pensioners, including persons living in the TOT of Ukraine or abroad and IDPs in GCA, were left without their pensions.²⁹

3.7. Imposing such an additional requirement for receiving a pension, which constitutes an acquired property right, is contrary to the Constitution and specific legislation establishing an exhaustive list of grounds for suspending pension payments. The PFU has thus effectively shifted responsibility for failures in its operations onto pensioners in vulnerable situations. The procedures for identifying pensioners and accepting declarations that they were not receiving pensions from the Russian Federation were affected by malfunctions of the PFU’s online portal and hours-long queues at its offices amid air attacks, adverse weather conditions and power outages. Furthermore, the suspension of pension payments automatically resulted in the suspension of the subsistence allowance paid to these IDPs. Following sustained advocacy by the Coalition, the deadline for notifying the PFU that a pension was not being received from the Russian Federation was extended, and payments to many

24 Ukraine Protection Survey No. 2. UNHCR and the Ukrainian Parliament Commissioner for Human Rights (November 2025). URL: https://www.unhcr.org/sites/ua/files/2025-12/Protection%20Survey%20UKR_0.pdf?_cf_chl_f_tk=g35XjPoXWYWdrzDvmAlo6Wmt1PIWOeoulKmgpe30hs4-1784178965-1.0.1.1-axGaAue4ft.7HnqAAD43P.74rO9Gubzd14KBcicNxNc.

25 IDP Councils Portal. URL: <https://radyvpo.org.ua/>

26 Resolution of the Cabinet of Ministers of Ukraine No. 812 of 4 August 2023, “On Approval of the Model Regulation on the Council for Internally Displaced Persons”. URL: <https://zakon.rada.gov.ua/laws/show/812-2023-%D0%BF#Text>

27 Paragraph 14-4 of the Final Provisions of the Law of Ukraine “On Mandatory State Pension Insurance”, No. 1058-IV of 9 July 2003. URL: <https://zakon.rada.gov.ua/laws/show/1058-15#Text>

28 Resolution of the Cabinet of Ministers of Ukraine No. 299 of 11 February 2025, “On Certain Specific Aspects of the Payment of Pensions (Monthly Lifetime Allowances) and Insurance Benefits under Insurance against Occupational Accidents and Diseases Resulting in Incapacity for Work”. URL: <https://zakon.rada.gov.ua/laws/show/299-2025-%D0%BF>

29 Human Rights Defenders Call on the Government to Immediately Reinstate Pensions Suspended in January 2026. URL: <https://zmina.ua/en/statements-en/human-rights-defenders-call-on-the-government-to-immediately-reinstate-pensions-suspended-in-january-2026/>

pensioners were reinstated. Nevertheless, the relevant provision remains in the Law and will continue to result in further restrictions.

RECOMMENDATIONS:

1. Eliminate discriminatory conditions for receiving pensions, in particular by abolishing the requirement to submit declarations that payments are not being received from the Russian Federation and guaranteeing pension payments irrespective of a person's place of residence or current location.
2. Ensure that the personal data of individuals in GCA can be verified using state registers and databases; provide PFU staff with reliable video communication facilities; require documentary confirmation that identification has been completed; and systematically notify individuals by SMS of the need to undergo identification.
3. Ensure that IDP Councils are consulted on decisions by local self-government and executive authorities that may concern or affect the lives of IDPs, including by introducing standardised procedures for the participation of IDP Councils in decision-making processes at the local and regional levels.
4. Establish systematic feedback mechanisms between central executive authorities and IDPs, including through the activities of IDP Councils, to ensure that their proposals are taken into account when formulating and adjusting state policy.

6.135. Continue efforts to ensure access to education for all children (Portugal);

6.188. Continue efforts to improve the accessibility and quality of healthcare services and education for internally displaced persons (Angola);

6.189. Take further measures to improve access to quality education for internally displaced children, particularly children with disabilities, with a view to further implementing recommendations 97.42 and 97.126 from the second cycle (Haiti).

IN THE PROCESS OF IMPLEMENTATION

3.8. According to the Information and Computing Centre of the Ministry of Social Policy, approximately 780,000 IDP children are currently in GCA.³⁰ Meanwhile, systematic Russian strikes against energy and telecommunications infrastructure in GCA are undermining the practical conditions necessary for children to exercise their right to education through digital means.³¹ Two thirds of children in frontline areas rely exclusively on distance learning; 79% experience internet connectivity problems; 42% lack the necessary devices; and 40% are affected by frequent power outages.³² By the end of June 2025 alone, UNICEF had verified at least 240 attacks on educational facilities. Of the 4.6 million children facing barriers to education, more than 420,000 study exclusively online.³³ At the same time, Ukraine is taking measures to ensure access to education and is actively responding to these challenges: 39 digital learning centres with autonomous power supplies have been opened, while underground classrooms and schools operating in bomb shelters have been established. These measures demonstrate Ukraine's fulfilment of its positive obligations while also underscoring that external attacks are the root cause of these violations of rights.

30 Information and Computing Centre of the Ministry of Social Policy of Ukraine. URL: [dashboard-vpo](#)

31 Ukraine: Situation Report, OCHA, 30 October 2024. URL: <https://www.unocha.org/publications/report/ukraine/ukraine-situation-report-30-october-2024>

32 Annual Report 2024, UNICEF Ukraine, February 2025. URL: <https://open.unicef.org/download-pdf?country-name=Ukraine&year=2024>

33 4.6 million children in Ukraine face ongoing educational barriers, UNICEF, 1 September 2025. URL: <https://www.unicef.org/eca/press-releases/46-million-children-ukraine-face-ongoing-educational-barriers-fourth-academic-year>

3.9. Given that many IDPs from the TOT of Ukraine hold educational documents issued by the occupation authorities that are not recognised in Ukraine or in most other countries, Ukraine has introduced two legal mechanisms aimed at ensuring access to education, enabling individuals to obtain officially recognised educational qualifications, facilitating their integration into society in GCA and providing access to public services. These comprise a procedure for recognising learning outcomes at the level of complete general secondary education, introduced in February 2026,³⁴ and a procedure for recognising learning outcomes at the levels of vocational, professional pre-higher and higher education, introduced in July 2025.³⁵

3.10. With regard to the recognition of learning outcomes at the level of complete general secondary education, the procedure for obtaining a Ukrainian school-leaving certificate has effectively been simplified by reducing the number of examinations that applicants must pass. However, the practical possibility of using this mechanism remains extremely limited, as the recognition procedure requires schools to apply a special educational programme for persons from the TOT of Ukraine.³⁶ In practice, this programme remains almost entirely unimplemented because of legislative restrictions on the number of educational programmes that a school may apply simultaneously. Consequently, as of July 2026, only six individuals had been able to use this mechanism and obtain a Ukrainian-standard certificate of secondary education.

3.11. With regard to the recognition of learning outcomes at the levels of vocational, professional pre-higher and higher education, IDPs are permitted to undergo assessments at educational institutions designated by the MES in order to obtain a Ukrainian diploma or complete their studies within a shortened period. However, according to civil society organisations, the mechanism had not yet become operational as of July 2026. Moreover, to use it, individuals must hold a Ukrainian-standard school-leaving certificate. Given that the parallel mechanism for recognising school education is barely functioning, this requirement is, in practice, almost impossible to meet.

3.12. Since 2016, a simplified admission procedure for vocational, professional pre-higher and higher education institutions has been available to applicants who are IDPs and have recently fled from the TOT of Ukraine. It allows applicants holding secondary education documents issued by the occupation authorities to obtain a Ukrainian-standard certificate for admission purposes by passing two examinations. From 2027, however, applicants will instead be required to undergo assessment under the aforementioned educational programme. This change creates a foreseeable academic barrier, as the current legislation effectively prevents schools from implementing the programme, while the number of required examinations will increase radically and disproportionately. Furthermore, since 2022, state guarantees of admission to publicly funded places under the special quota for IDPs from the TOT of Ukraine have depended on annual decisions by the MES concerning the organisation of each admission campaign.³⁷ This approach creates uncertainty for applicants, making access to education unpredictable and exacerbating the legal and social vulnerability of applicants from the TOT of Ukraine.

RECOMMENDATIONS:

1. Remove legislative and administrative barriers preventing IDPs from accessing procedures for the recognition of learning outcomes at all levels of education.
2. Guarantee the implementation of special admission arrangements and state guarantees of publicly funded education for applicants who are IDPs from the TOT of Ukraine.

34 Order of the Ministry of Education and Science of Ukraine No. 338 of 23 February 2026, "On Certain Matters concerning the Recognition, at the Levels of Complete General Secondary Education, of the Learning Outcomes of Persons Who Lived in the Temporarily Occupied Territory of Ukraine": <https://zakon.rada.gov.ua/laws/show/z0496-26#Text>

35 Resolution of the Cabinet of Ministers of Ukraine No. 871 of 15 July 2025, "On Approval of the Procedure for Recognising Learning Outcomes Attained in the Temporarily Occupied Territory of Ukraine at the Levels of Vocational (Vocational and Technical), Professional Pre-higher and Higher Education": <https://zakon.rada.gov.ua/laws/show/871-2025-n#Text>

36 Order of the Ministry of Education and Science of Ukraine No. 1047 of 21 July 2025, "On Approval of the Standard Educational Programme for Teaching at the Levels of Complete General Secondary Education Persons Who Live or Have Lived in the Temporarily Occupied Territory of Ukraine". URL: <https://ips.ligazakon.net/document/mus41813>

37 Subparagraph 23 of paragraph 2 of Section XV, "Final and Transitional Provisions", of the Law of Ukraine "On Higher Education": <https://zakon.rada.gov.ua/laws/show/1556-18#Text>